

1 Debra I. Grassgreen (CA Bar No. 169978)  
2 John D. Fiero (CA Bar No. 136557)  
3 Jason H. Rosell (CA Bar No. 269126)  
4 Steven W. Golden (admitted *pro hac vice*)  
5 PACHULSKI STANG ZIEHL & JONES LLP  
6 One Sansome Street, Suite 3430  
7 San Francisco, California 94104-4436  
8 Tel: 415-263-7000; Fax: 415-263-7010  
9 Email: dgrassgreen@pszjlaw.com; jfiero@pszjlaw.com;  
10 jrosell@pszjlaw.com; sgolden@pszjlaw.com

11 *Counsel to the Official Committee  
12 of Unsecured Creditors*

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**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SANTA ROSA DIVISION**

In re:  
LEFEVER MATTSON, a California  
corporation, *et al.*,  
Debtors.<sup>1</sup>

In re  
KS MATTSON PARTNERS, LP,  
Debtor.

Case No. 24-10545 CN (Lead Case)  
(Jointly Administered)  
Chapter 11

**DECLARATION OF DEBRA I.  
GRASSGREEN IN SUPPORT OF SECOND  
INTERIM APPLICATION OF  
PACHULSKI STANG ZIEHL & JONES  
LLP FOR ALLOWANCE AND PAYMENT  
OF COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR  
THE PERIOD JANUARY 1, 2025  
THROUGH APRIL 30, 2025**

Date: November 19, 2025  
Time: 1:00 p.m. (Pacific Time)  
Place: *Via Zoom or In-Person at:*  
1300 Clay Street  
Courtroom 215  
Oakland, CA 94612

**Objection Deadline: November 12, 2025**

<sup>1</sup> The last four digits of LeFever Mattson's tax identification number are 7537. The last four digits of the tax identification number for KS Mattson Partners, LP ("KSMP") are 5060. KSMP's address for service is c/o Stapleton Group, 514 Via de la Valle, Solana Beach, CA 92075. The address for service on LeFever Mattson and all other Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 9562. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://veritaglobal.net/LM>.

1 I, Debra Grassgreen, declare as follows:

2 1. I am an attorney authorized to practice in the Northern District of California. I am a  
3 partner at Pachulski Stang Ziehl & Jones LLP (“PSZJ” or the “Firm”), counsel to the Official  
4 Committee of Unsecured Creditors (the “Committee”) in the above-captioned chapter 11 cases (the  
5 “Chapter 11 Cases”).

6 2. I make this declaration in support of the *Second Interim Application of Pachulski Stang*  
7 *Ziehl & Jones LLP for Allowance and Payment of Compensation and Reimbursement of Expenses for*  
8 *the Period January 1, 2025 through April 30, 2025* (the “Application”). I am an attorney designated  
9 by PSZJ to sign the Application on its behalf.

10 3. Pursuant to the United States Bankruptcy Court’s Guidelines for Compensation and  
11 Expense Reimbursement of Professionals (the “Northern District Guidelines”), I certify that:

12 a. I have read the Application.

13 b. To the best of my knowledge, information, and belief formed after reasonable  
14 inquiry, the compensation and expense reimbursement sought in the  
15 Application are in conformity with the Northern District Guidelines except as  
16 otherwise indicated in the Application.

17 c. The compensation requested in the Application has been billed at rates and in  
18 accordance with practices no less favorable than those currently employed by  
19 PSZJ and generally accepted by PSZJ’s clients.

20 4. There is no agreement or understanding between PSZJ and any other person other than  
21 the partners of PSZJ for the sharing of compensation to be received for services rendered in this case.

22 5. PSZJ’s attorneys are skilled and have particular expertise in representing official  
23 committees of unsecured creditors in cases such as these where the creditor body is primarily  
24 composed of individual victims of fraud. Additionally, it is my opinion that PSZJ has performed well  
25 in these Chapter 11 Cases thus far, and that the fees it charges are commensurate with the fees charged  
26 by PSZJ’s counterparts engaged in non-bankruptcy specialties of the law

27 6. Attached to the Application as **Exhibit H** is a true and correct copy of the letter  
28 transmitting the Application to the members of the Committee and advising of the Committee’s right

1 to review and object to the compensation and expense reimbursement sought therein. To the best of  
2 my knowledge, information, and belief, this letter was transmitted to the Committee by electronic  
3 email on October 29, 2025.

4 I declare under penalty under the laws of the State of California that the foregoing is true and  
5 correct.

6 Executed this 29<sup>th</sup> day of October, 2025.

7 /s/ Debra I. Grassgreen  
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9 Debra I. Grassgreen  
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